

# Exhibit 43

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW JERSEY

4 \*\*\*\*\*  
IN RE: VALSARTAN, LOSARTAN, MDL No. 2875  
5 AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION HON ROBERT B.  
6 KUGLER

\*\*\*\*\*  
7 THIS DOCUMENT APPLIES TO ALL  
CASES

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10 - CONFIDENTIAL INFORMATION -  
SUBJECT TO PROTECTIVE ORDER

Continued Remote Videotaped via  
Zoom Deposition of HAI WANG, commencing at  
9:07 a.m., on the 11th of March, 2021, before  
Maureen O'Connor Pollard, Registered  
Diplomate Reporter, Realtime Systems  
Administrator, Certified Shorthand Reporter.

19

21 GOLKOW LITIGATION SERVICES  
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1       offered the same price as CVS. Like you have  
2       predicted during your recent visit of Huahai  
3       US, we may have to lower our Valsartan price  
4       to keep our current market share. We don't  
5       want valsartan to be 2nd Losartan case. We  
6       have to be proactive."

7                       That's what you wrote that day,  
8       right?

9               A.       That's correct.

10              Q.       And Mr. Chen is who? What's  
11       his role in ZHP?

12              A.       He's the chairman of ZHP.

13              Q.       He's the highest level  
14       executive in the whole company, right?

15              A.       Yes.

16                       MR. GOLDBERG: Objection.

17       BY MR. SLATER:

18              Q.       And this is reciting that  
19       Mr. Chen actually visited Huahai US for  
20       business, correct?

21              A.       Yeah, Mr. Chen is the chairman,  
22       so he visited subsidiary from time to time.

23              Q.       Is that something he does on a  
24       routine basis?

1 A. Yes, before the pandemic.

2 Q. Before the pandemic, how often  
3 would Mr. Chen visit the United States  
4 businesses?

5 A. Once a year, twice a year.

6 Q. When you refer to the fact that  
7 he had predicted during his recent visit that  
8 you may have to lower the valsartan price to  
9 keep your current market share, do you  
10 remember the context of that discussion?

11 MR. GOLDBERG: Objection to  
12 form.

13 A. Because when I see in the US  
14 market, Mr. Chen's overseen all the API  
15 operations, he has more intell in terms of  
16 API competition, because it's eventually  
17 going to trickle down to the finished dosage  
18 form market. If they see very competitive  
19 API offering, that was the discussion, so we  
20 needed to be proactive.

21 BY MR. SLATER:

22 Q. And his conclusion had been,  
23 and -- rephrase.

24 It appears that --